

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: JOINT PETITION FOR PURCHASE :  
AND SALE OF ASSETS BY THE : Docket # D-06-13  
NARRAGANSETT ELECTRIC CO. :  
AND THE SOUTHERN UNION CO. :

**MOTION OF THE GEORGE WILEY**  
**CENTER TO SUBMIT TESTIMONY BY**  
**JUNE 23, 2006**

The George Wiley Center respectfully moves that the hearing examiner:

1. Permit the Wiley Center to submit written testimony from John Howat of the National Consumer Law Center by June 23, 2006, in lieu of the originally scheduled date of June 19, 2006; and
2. Permit written rebuttal to be submitted by June 27, 2006 or, in the alternative, permit oral rebuttal at the hearing scheduled for June 28 and 29, 2006.

The Wiley Center makes this motion on the following grounds:

- John Howat has offered his services *pro bono* and must schedule any activity in this case around his usual business schedule;
- Mr. Howat has previously scheduled work out-of-state that will prevent him from providing testimony in this case until June 23, 2006;
- Unless this extension is permitted, the Wiley Center will be unable to present testimony in this case.

Counsel informed all the parties of this request by email yesterday, June 6, 2006, but had not yet received responses from most participants.

WHEREFORE, the George Wiley Center asks that its motion be granted.

Respectfully submitted,  
The George Wiley Center  
By its attorney,

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CERTIFICATE OF SERVICE

I certify that on the 7<sup>th</sup> day of June, 2006, I caused a copy of this document to be emailed to each of the following:

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